

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Petition Pursuant to 47 U.S.C. § 160 for
Partial Forbearance from the Commercial
Mobile Radio Services Number Portability
Obligation

CC Docket No. 01-184

COMMENTS OF VERIZON

Verizon Wireless has demonstrated that CMRS providers can take part in number pooling without making the substantial additional investment required for number portability. The prompt implementation of pooling will benefit all carriers and all users of telecommunications services. Pooling should be the first priority.

The Verizon telephone companies¹ are concerned that requiring CMRS number portability will distract from and delay the implementation of pooling. CMRS portability will also significantly raise the industry costs of the number portability, costs that all carriers must share and that customers ultimately will bear. The Commission has repeatedly concluded that the wireless industry is already competitive, and CMRS number portability — with all its costs — cannot be necessary for competition. For these reasons and the others in Verizon Wireless' petition, Verizon urges the Commission to grant that petition.

¹ The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc., listed in Attachment A.

Respectfully submitted,

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Of Counsel

Dated: September 21, 2001

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.